

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CATHRINE VEIKOS

Plaintiff,

v.

TRUSTEES OF THE  
UNIVERSITY OF PENNSYLVANIA

Defendant.

Civil Action No. 2:20-cv-04408

**DEFENDANT’S RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW OR,  
IN THE ALTERNATIVE, MOTION FOR NEW TRIAL OR REMITTITUR**

Defendant Trustees of the University of Pennsylvania (“Defendant” or “Penn”), by and through its undersigned counsel and pursuant to Federal Rules of Civil Procedure 50(b), 59(a), and 59(e), moves this Court for judgment as a matter of law or, in the alternative, for new trial on Plaintiff’s retaliation claim based on the 2012 tenure decision or remittitur of the jury’s compensatory damages award. The reasons further supporting Penn’s motion are fully set forth in the supporting Memorandum of Law, which is filed herewith and incorporated by reference.

Defendant respectfully requests that the Court:

1. enter judgment as a matter of law in Defendant’s favor on Plaintiff’s retaliation claim based on the 2012 tenure decision because Plaintiff did not present a legally sufficient basis upon which the jury could have found that “but for” Penn’s retaliation, Plaintiff would have received tenure in 2012; or
2. order a new trial on Plaintiff’s retaliation claim based on the 2012 tenure decision because Plaintiff produced insufficient evidence to establish that she would have received tenure in 2012 but for Penn’s retaliation, and therefore, the jury’s verdict on the retaliation claim is contrary to the clear weight of the evidence; or
3. alternatively, because the jury’s award of \$1,000,000 in emotional distress damages is grossly excessive, condition any denial of a new trial on remittitur of Plaintiff’s compensatory damages award from \$1,000,000 to an amount not to exceed \$50,000.

Wherefore, Defendant respectfully requests that the Court grant its motion for judgment as a matter of law or, in the alternative, new trial or remittitur.

Dated: May 30, 2023

Respectfully Submitted,

By: s/ Michael L. Banks

Michael L. Banks

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*Attorneys for Defendant Penn*

**CERTIFICATE OF SERVICE**

I, Michael L. Banks, hereby certify that a true and correct copy of the foregoing document was filed electronically and is available for viewing and downloading from the ECF system of the U.S. District Court for the Eastern District of Pennsylvania, and that I served the same via electronic filing on May 30, 2023 upon the following:

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